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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
GOOGLE'S ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
GOOGLE'S MOTION FOR SUMMARY
JUDGMENT**

Judge: Hon. Yvonne Gonzalez Rogers

[PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal Portions of Google's Motion for Summary Judgment, Dkt. 907 ("Motion"). Having considered the Motion, supporting declarations, and other papers on file, and good cause having been found, the Court ORDERS as follows:

Document or Portion of Document Sought to be Sealed	Evidence Offered in Support of Sealing	Ruling
Broome Declaration Ex. 11 Plaintiff William Byatt's Objections and Responses to Defendant's Third Set of Requests for Admission (Nos. 22-29) Highlighted Portions at Pages 7:9-10, 7:12-13.	McGee Decl., ¶¶ 6-13.	
Broome Declaration Ex. 16 Plaintiff Chasom Brown's Objections and Responses to Defendant's First Set of Interrogatories (Nos. 1-6) Highlighted Portions at Pages 4:13, 4:17-19, 4:21, 7:5-7, 7:10.	McGee Decl., ¶¶ 6-13.	
Broome Declaration Ex. 17 Plaintiff William Byatt's Objections and Responses to Defendant's First Set of Interrogatories (Nos. 1-6) Highlighted Portions at Pages 4:13-15, 4:17-18, 4:20-21, 7:1-2, 7:5.	McGee Decl., ¶¶ 6-13.	

1	Broome Declaration Ex. 18	McGee Decl., ¶¶ 6–13.	
2	Plaintiff Christopher Castillo’s		
3	Objections and Responses to		
4	Defendant’s First Set of		
5	Interrogatories (Nos. 1-6)		
6	Highlighted Portions at Pages		
7	4:13-15, 4:17-20, 4:22, 5:7, 7:2-8.		
8	Broome Declaration Ex. 19	McGee Decl., ¶¶ 6–13.	
9	Plaintiff Jeremy Davis’ Objections		
10	and Responses to Defendant’s		
11	First Set of Interrogatories (Nos. 1-		
12	6)		
13	Highlighted Portions at Pages		
14	4:13, 4:16, 7:6.		
15	Broome Declaration Ex. 20	McGee Decl., ¶¶ 6–13.	
16	Plaintiff Chasom Brown’s Verified		
17	Amended Objections and		
18	Responses to Defendant		
19	Interrogatories 1, 4, and 5		
20	Highlighted Portions at Pages 4:6,		
21	4:11, 5:10-13, 5:15-16, 6:10-12,		
22	6:15, 7:5-8, 7:11.		
23	Broome Declaration Ex. 21	McGee Decl., ¶¶ 6–13.	
24	Plaintiff William Byatt’s Verified		
25	Amended Objections and		
26	Responses to Defendant		
27	Interrogatories 1, 4, and 5		
28	Highlighted Portions at Pages 4:6,		
	5:10-13, 5:15-16, 6:10-11, 6:14,		
	7:3-5, 7:8.		

1	Broome Declaration Ex. 22	McGee Decl., ¶¶ 6–13.	
2	Plaintiff Christopher Castillo's		
3	Verified Amended Objections and		
4	Responses to Defendant		
5	Interrogatories 1, 4, and 5		
6	Highlighted Portions at Pages 4:6,		
7	5:10-18, 6:12-18, 7:7-14.		
8	Broome Declaration Ex. 23	McGee Decl., ¶¶ 6–13.	
9	Plaintiff Jeremy Davis' Verified		
10	Amended Objections and		
11	Responses to Defendant		
12	Interrogatories 1, 4, and 5		
13	Highlighted Portions at Pages 4:7,		
14	5:10-13, 5:15-17, 6:15, 7:10.		
15	Broome Declaration Ex. 28	McGee Decl., ¶¶ 6–13.	
16	Plaintiff Monique Trujillo's		
17	Objections and Responses to		
18	Defendant's First and Second Set		
19	of Interrogatories (Nos. 3 & 10)		
20	Highlighted Portions at Pages		
21	3:12, 4:13, 4:16-17, 4:20, 6:12-17,		
22	7:11-13, 7:15.		
23	Broome Declaration Ex. 30	McGee Decl., ¶¶ 6–13.	
24	Plaintiff William Byatt's		
25	Objections and Responses to		
26	Defendant's Fourth Set of		
27	Interrogatories (Nos. 12-15)		
28	Highlighted Portions at Pages		
	4:16-17, 4:19-20.		

1	Broome Declaration Ex. 39	McGee Decl., ¶¶ 6–13.	
2	Plaintiffs’ Objections and		
3	Responses to Defendant’s Sixth		
4	Set of Interrogatories (No. 17)		
5	Highlighted Portions at Pages		
6	7:11-13, 7:16-17, 7:20, 8:2-3, 8:6-		
7	7, 12:24-13:1.		
8	Broome Declaration Ex. 77	McGee Decl., ¶¶ 6–13.	
9	Plaintiffs’ April 15, 2022 Expert		
10	Report of Jonathan E. Hochman		
11	Highlighted Portions of Report at		
12	¶¶ 88-90, 115, 174-78, 224-25,		
13	234, 236, 243, 246-47.		
14	Highlighted Portions of Appendix		
15	B at ¶¶ 11-13, 18-23; Pages 17-36.		
16	Highlighted Portions of Appendix		
17	G at ¶¶ 7-8, 24, 26.		
18	Highlighted Portions of Appendix		
19	H at Table of Contents; ¶¶ 1-41.		
20	Broome Declaration Ex. 85	McGee Decl., ¶¶ 6–13.	
21	Declaration of Jonathan McPhie		
22	Regarding Google Disclosures		
23	Highlighted Portions at Pages		
24	22:21, 22:23, 22:25, 23:2, 23:4,		
25	23:6.		

IT IS SO ORDERED.

DATED: _____

Honorable Yvonne Gonzalez Rogers
United States District Judge